

United States Environmental Protection Agency Region 10 Emergency Response Unit POLLUTION REPORT

I. HEADING

Date: February 21, 2000

Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington

From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit

Tel: Office (206) 553-0279

TO: See Distribution List on last page

POLREP No.10 (Progress)

II. BACKGROUND

Site ID: SSID # 106W Delivery Order No: 081-10 -02

Response Authority: CERCLA,

CERCLIS No: WASFN1002182

NPL Status: Not Listed (former RCRA site within Commencement

Bay Superfund site)

State Notification: Washington State Department of Ecology referred site

to EPA

Action Memo Status: Signed on December 17, 1999 and January 7, 2000

Removal Start Date: December 17, 1999 Expected Completion Date: March 17, 2001

Site Web Page: www.epa.gov/r10earth, click Index, click C for

CleanCare. or use URL: http://epainotes1.rtpnc.epa.

gov:7777/r10/cleanup.nsf/sites/CleanCare

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47/ 16' 25" North and longitude 122/ 23' 32" West. The site is located in the ATacoma Tideflats@ area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS 4-B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

February 14, 2000 (Monday)

Personnel on site: 7 START, 11 ERRS, 3 USCG, 2 EPA, 1 Temp Weather: Cool, overcast with rain

All site personnel attended daily safety meeting and discussed site safety and planned activities. START collected data as oil drums in Building 5 were sampled. Managed and entered data related to RCRA or non oil filter drums. ERRS discharged water from Baker Tank (BT) 21 to city sewer, PCS pick up 7 TIP trailers and moved them to their property adjacent to the site, cleaned BT 21 and recleaned BT 1, treated approximately 6,000 gallons of water, pulled samples from 4 rows of drums located in Building 5, and pumped contact water and non contact water.

February 15, 2000 (Tuesday)

Personnel on site: 5 START, 11 ERRS, 3 USCG, 2 EPA, 1 Temp Weather: overcast, cold, high 45 F

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued collecting data as oil drums in Building 5 were sampled, continued managing and entering data related to RCRA or non oil filter drums, provided the Coast Guard with revised Generator list, and gathered and reviewed procedures for handling Confidential Business Information (CBI). ERRS treated approximately 12,000 gallons of water, recleaned BT 1, continued pulling samples from drums in Building 5, pumped water to Lincoln Ave. once, and pumped approximately 15 drums of oil into poly tank.

February 16, 2000 (Wednesday)

Personnel on site: 5 START, 11 ERRS, 3 USCG

Weather: sunny, cool, high of 45 F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued collecting data as oil drums in Building 5 were sampled, continued managing and entering data related to RCRA or non oil filter drums, sampled BT 7, and assisted ERRS with drum organization. ERRS cleaned BT 11, Emerald Services transported contact waste water from BTs 13 and 14 for off site disposal. Philips Services Corp., under agreement with TIP leasing, staged four 40-foot long trailers in the Philips land adjacent to the command posts, pending TIP leasing decontaminating the trailers. Sampling of the first set of drums in Building 5 was completed.

February 17, 2000 (Thursday)

Personnel on site: 5 START, 11 ERRS, 3 USCG, 4 EPA

Weather: Clear, light breeze, cold, high lower 40's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START collected wastewater samples from BTs number 7 and 8, continued inventory and data entry for RCRA waste drums, documented sampling of drums in Building 5, and continued oversight of on site activities. ERRS had a contractor (Emerald Services) remove liquids from BTs 25 and 26 on Lincoln Avenue, ERRS decontaminated the tanks, collected samples in Building 5, pumped 20 drums of oil and 4 totes of oil into poly tank, pumped 52 drums of antifreeze into BT 18, discharged treated waste water and began treating the next batch.

February 18, 2000 (Friday)

Personnel on site: 6 START, 11 ERRS, 3 USCG, 2 EPA

Weather: Overcast, light breeze, high in the mid 40's

All site personnel attended daily safety meeting and discussed site safety

and planned activities. START inventoried drums (mostly from vendors that supplied materials to CleanCare) in the north end of Building 5, and continued locating drums on site for vendors with over 250 gallons of waste. Emerald Services transported contact wastewater from BTs 2 and 3 for off site disposal. ERRS decontaminated BT 13, assisted with the inventory of drums in the north end of Building 5, continued treating contact water, and continued locating drums on site for generators with over 250 gallons.

February 19, 2000 (Saturday)

Personnel on site: 3 START, 11 ERRS, 3 USCG Weather: Overcast, light breeze, high in the mid 40's

All site personnel attended daily safety meeting and discussed site safety and planned activities. START and ERRS, working together, completed locating, inventorying and staging drums on site for vendors with over 250 gallons of waste. ERRS also started cleaning BT 3. START managed data from the inventory.

2.Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) and the City (City of Tacoma Public Works) continue to provide assistance with discharge of non-contact storm water and treated contact water.

Drums -

- Oil Filter Drums: This week no used oil filters, or drums that held used oil filters, were removed from the site. A total of nine rolloffs of used oil filters and four rolloffs of used oil filter drums have been removed from the site.
- RCRA Drums: Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA drums).
- Oil Drums in Building #5: Continued sampling and collecting data for the oil drums located in the southern portion of Building #5 and hstarted performing Hazard Categorization tests on these samples. The material from 35 of these drums and 4 totes was pumped into a 6,000 gallon storage tank to reduce disposal costs. Disposal facility to be determined.

Antifreeze Drums: Antifreeze from 52 drums was pumped into Baker Tank #18 to reduce disposal costs. Disposal facility to be determined.

Baker Tanks - Treated and discharged two batches (approximately 40,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Baker Tanks are decontaminated and returned to the vendor after they are emptied.

Surface Water - This week, continued treating contact surface water and decontamination water with the temporary waste water treatment system. Continued sampling and pumping non contact surface water to the Lincoln Ave. ditch, under agreement with Washington State Department of Ecology.

ASTs - No AST work was performed this week. To date all of the tanks in Tank Farm 1 (T-1, T-3, T-4, and T-5) have been sampled.

Soil - No work was performed this week regarding site soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

A START contracted temporary employee provided assistance to EPA Civil Investigations by photocopying documents specified.

3.Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. EPA intends to gather additional PRP information during the removal action.

B.Planned Removal Activities

To minimize/eliminate to threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

<u>Drums:</u> organization of drums and documents (manifests & profile analyses), generator notification, hazard categorization and disposal tests, and removal of containers from the site. A meeting at CleanCare is scheduled for February 22, 2000. At this meeting generators with wastes stored in drums/containers will have the opportunity to identify their waste and schedule a time to remove their waste from the site.

<u>Baker Tanks:</u> The water from some tanks will continue to be treated on site and discharged. At the same time, water from other Baker Tanks will continue to be shipped off site. As tanks are emptied, they will be returned to the rental company.

Surface Water: manage surface water as it collects onsite (including sampling,

treatment, and discharge), clean concrete and asphalt surfaces that currently impact surface water, establish and implement a long term. plan/recommendation for surface water management including possibly construction of an asphalt cap.

ASTs: sampling, handling of contents (off site disposal or combination of onsite treatment and off site disposal anticipated), clean tanks, possible dismantling of some tanks and containment structures and remove from site

<u>Soil:</u> Possible further sampling prior to excavation, confirmation sampling, and removal from site or onsite treatment. Installation of asphalt cap if deemed necessary.

C.Next Steps

EPA, ERRS, START, and the USCG Strike Team to continue managing onsite surface water. Complete the data management for all RCRA drums, locate and file the manifests for the RCRA drums, and prepare for generator recovery of waste drums. Treat some Baker Tank water, ship some of it off site. Discharge treated water to the Tacoma Sanitary Sewer, in accordance with the Special Approved Discharge (SAD). Decontaminate Baker Tanks as they are emptied and return them to the vendor.

D.Key Issues

Security Off Duty City of Tacoma Police continue with site security.

<u>Discharge of non contact waters</u> Noncontact surface water is being discharged to the Lincoln Avenue Ditch, as needed, with daily permission of the Washington State Department of Ecology (DOE). Discharge requirements established by DOE are being followed.

Management of contact water; Contact surface water (that which falls with in the secondary containment structures) is being pumped into temporary storage tanks (Baker Tanks). This water will has been analyzed and some of it is being treated and discharged and some is being disposed off site. Performing both tasks simultaneously will reduce the length of time required to accomplish this task, reduce the associated costs, such as Baker Tank rental fees, and remove the threat of a release.

<u>Drum/Container Waste</u>; Generators of site waste stored in drums/containers will have the opportunity dispose of their wastes. This process will include a meeting on site February 22, 2000.

V. Cost Information

Estimated costs are summarized below

Established	Estimated Costs
Ceiling	(as of 2/19/00)

EPA	\$ 150,000	\$14,360
START	\$ 350,000	\$70,634
ERRS	\$ 1,100,000	\$ 521,555
Coast Guard	\$ 100,000	<u>\$27,714</u>
Total	\$ 1,700,000	\$ 634,263

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment- Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in rolloffs	removed oil filters from 55 gallon drums and consolidated in rolloffs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	120 cu yd	placed liners in rolloffs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Bethlehem Steel for recycling.
Oily Debris	solidified waste	20 cu yd	placed liners in rolloffs	consolidated in rolloffs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	40,000 gal	contained in Baker Tanks	Emerald Petroleum Services=s (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	83,400 gal	contained in Baker Tanks	Phillips Services Corp. water treatment plant	Phillips Services Corp. to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	20,000 gal	contained in Baker Tanks	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks	solid	Tank 15	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks, Inc.)
Tip Trailers	solid	11 trailers	NA	transported off site to make room for other activities	temporarily stored at the Phillips Services Corp. facility adjacent to the site
Oil From Drums	liquid	60 drums + 4 totes		a 6,000 gallon poly tank on site	to be determined
Antifreeze from Drums	liquid	65 drums		bulked into Baker Tank #18	to be determined

Used oil filters have been removed from site to free up room to stage, sort, and segregate the large volume of drums on site. The drums containing the filters were located in Building 5, inside of on-site tractor trailer trucks, and co-mingled with regulated wastes. Currently, the same is being done with the oil drums located in the southern part of Building 5.

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby EPA Region 10, Emergency Response Unit, Attention: Chris Field EPA Washington Operations Office, Attention: Julie Hagensen Washington State Department of Ecology, Attention: Jim Sachet City of Tacoma Public Works Department, Attention: Michael Kennedy EPA Region 10 Web page, Attention: Beth Kunz EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending.